

**IN THE CIRCUIT COURT OF CRAWFORD COUNTY, ARKANSAS  
CRIMINAL DIVISION**

**STATE OF ARKANSAS**

**PLAINTIFF**

**VS.**

**CASE NO: 17CR-22-960**

**MELISSA DUNBAR**

**DEFENDANT**

**MOTION FOR DISCOVERY**

Comes now, the Defendant, Melissa Dunbar, by and through her Attorney, Adam H. Rose, and moves the Court to require the State to provide the following, in accordance with Arkansas Rules of Criminal Procedure 17.1, 17.3, and 17.4:

1. The Defendant requests the following material and information that is or may come within the possession, control, or knowledge of the prosecuting attorney:

(a) The names and addresses of persons the prosecuting attorney intends to call as witnesses at any hearing or at trial;

(b) Any written or recorded statements and the substance of all oral statements made by the defendant or co-defendant;

(c) Any reports or statements of experts made in connection with this case, including results of scientific tests, experiments or comparisons;

(d) Any books, papers, documents, photographs, or tangible objects the prosecuting attorney intends to use in any hearing or at trial or what were obtained from or belong to the defendant or co-defendant;

(e) Any record of prior criminal convictions of persons the prosecuting attorney intends to call as witnesses at any hearing or at trial, if the prosecuting attorney has such information or it can be readily obtained by him;

(f) Whether there has been any electronic surveillance of the defendant's premises or of conversations to which the defendant was a party;

(g) The transcript of any relevant prior testimony, whether before a grand jury or in any other proceedings that may have been held in this case, including, but not limited to, municipal court testimony.

2. The prosecuting attorney should disclose and remit inspection and copying of any relevant material regarding:

(a) Any search and seizure of defendant or co-defendant;

(b) The acquisition of any statements from the defendant;

(c) Any police reports made in connection with this case that relate to potential testimony of any police officers or other witnesses;

(d) Any physical, documentary, scientific, demonstrative, or photographic evidence the State intends to introduce or use at any hearing or at trial.

3. The prosecuting attorney shall disclose to defense counsel any material or information within his knowledge, possession, or control in the hands of any law enforcement agency that could negate the guilt of the defendant of the offense charged or could reduce the punishment therefore.

4. The prosecuting attorney should disclose the name and address of any information that led to or assisted in making the arrest in this case.

5. The prosecuting attorney should disclose whether or not there is any Rule 404 (a) and Rule 404 (b) information, state the nature of said information and provide the defense with same. Additionally, the prosecuting attorney should disclose whether or not there are any Rule 609 information, state the nature of said information and provide the defense with same. Failure to provide said information should result in the prosecutor being denied the right to present such evidence at trial of this matter.

6. The prosecuting attorney should disclose whether any requests for or offers of immunity, leniency, sentence of charge concessions, or other inducements have been made by or to any co-defendant, potential witness or informant.

7. The Prosecuting Attorney shall upon completion of his discovery, run and forward ACIC searches on the Defendant(s) and also on ALL prosecution witnesses. Failure to provide these searches should result in their disqualification as witnesses at trial.

8. The Prosecuting Attorney should disclose any information and/or documentation obtained by the State on prospective jurors on this case through the use of NCIC and/or ACIC. Said information is to be provided in a reasonable time prior to trial.

9. That this information should be given to defendant despite any "open-file" policy the state might maintain.

The Defendant requests this information as soon as possible before trial. The State should consider this a continuing Motion with all information received by the State to the date of trial to be furnished to the defendant in compliance with Ark. Rules of Criminal Procedures, Rule 19.2 (Repl. 1977).

Respectfully Submitted  
**MELISSA DUNBAR**, Defendant  
By: /s/ Adam H. Rose  
Adam H. Rose, ABA#2020194  
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**CERTIFICATE OF SERVICE**

I, Adam H. Rose, herby certify that on this 19th day of December 2022, that a true and correct copy of the foregoing pleading was provided to the following:

Crawford County Circuit Court  
E-FILE

Crawford County Prosecuting Attorney  
E-FILE

/s/ Adam H. Rose  
Adam H. Rose